

1 Michael Paretti  
2 Nevada Bar No. 13926  
3 SNELL & WILMER L.L.P.  
4 3883 Howard Hughes Parkway, Suite 1100  
5 Las Vegas, NV 89169  
6 Telephone: (702) 784-5200  
7 Facsimile: (702) 784-5252  
8 Email: mparetti@swlaw.com

9  
10 Attorneys for Defendant  
11 Credit One Bank, N.A.

12  
13 **UNITED STATES DISTRICT COURT**

14 **DISTRICT OF NEVADA**

15 LAYNE PARTEE,

16 Plaintiff,

17 vs.

18 CREDIT ONE BANK, N.A.,

19 Defendant.

20 CASE NO.: 2:18-cv-02381-JCM-NJK

21 **UNOPPOSED MOTION FOR EXTENSION  
22 TO RESPOND TO COMPLAINT  
23 (FIRST REQUEST)**

24  
25 Defendant Credit One Bank, N.A. (“Credit One”), by and through its undersigned counsel,  
26 for good cause shown, hereby submits this unopposed motion<sup>1</sup> to extend Credit One’s deadline to  
27 respond to Plaintiff’s Complaint [ECF No. 1] to January 31, 2019, for the following reasons:

28 1. Plaintiff served the Complaint and Summons on Credit One on December 20,  
29 2018.

30 2. Credit One’s Answer is currently due January 10, 2019.

31 3. Counsel for Credit One was only recently retained, and requires additional time to  
32 locate, organize, and review the relevant documents and prepare the appropriate response.

33 4. Moreover, counsel for Credit One’s offices were closed for several days during the  
34 response period due to the intervening holidays.

35 5. On January 2, 2019, counsel for Plaintiff agreed to the extension requested herein.

36  
37 

---

38 <sup>1</sup> On January 2, 2019, Plaintiff’s counsel, Tav Gomez, agreed to the 21-day extension and  
39 requested Credit One file an unopposed motion for the extension.

6. This extension request is sought in good faith and is not made for the purpose of delay.

Therefore, Credit One respectfully requests an extension to respond to Plaintiff's Complaint to and including January 31, 2019.

DATED: January 3, 2019

SNELL & WILMER L.L.P.

By: /s/ Michael Paretti

---

Michael Paretti  
Nevada Bar No. 13926  
3883 Howard Hughes Parkway  
Suite 1100  
Las Vegas, Nevada 89169

*Attorneys for Defendant Credit One Bank,  
N.A.*

## **ORDER**

**IT IS ORDERED** that Defendant's unopposed motion for extension to respond to Plaintiff's complaint, Docket No. 13, is GRANTED. Defendant must respond to Plaintiff's complaint no later than January 31, 2019.

DATED: January 3, 2019.

NANCY J. KOPPE  
UNITED STATES MAGISTRATE JUDGE